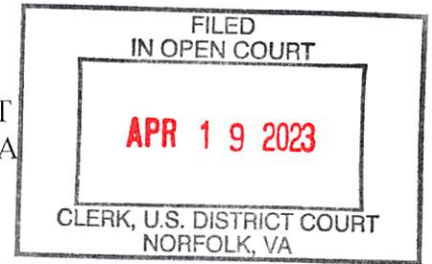


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA)	CRIMINAL NO. 2:23-cr- <u>51</u>
)	
v.)	18 U.S.C. § 922(a)(6)
)	False Statement During Purchase of Firearm
JONATHAN MORRELL SCOTT,)	(Counts 1-4)
)	
Defendant.)	18 U.S.C. § 924(d);
)	28 U.S.C. § 2461(c)
)	
)	Criminal Forfeiture

INDICTMENT

April 2023 TERM - at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(False Statement During Purchase of Firearm)

On or about November 16, 2020, in the City of Virginia Beach, Virginia, in the Eastern District of Virginia, the defendant, JONATHAN MORRELL SCOTT, in connection with the acquisition of a firearm, to wit, a Taurus Pistol, Model: PT1911, Caliber .45, from Superior Pawn & Gun, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did unlawfully and knowingly make a false and fictitious written statement to Superior Pawn & Gun, which statement was intended and likely to deceive Superior Pawn & Gun as to a fact material to the lawfulness of the sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer of the

firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).)

COUNT TWO

(False Statement During Purchase of Firearm)

On or about December 18, 2020, in the City of Chesapeake, Virginia, in the Eastern District of Virginia, the defendant, JONATHAN MORRELL SCOTT, in connection with the acquisition of a firearm, to wit, a Girsan Pistol, Model: REGARD GEN 4, Caliber: 9mm, from Chesapeake Pawns, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did unlawfully and knowingly make a false and fictitious written statement to Chesapeake Pawns, Inc., which statement was intended and likely to deceive Chesapeake Pawns, Inc. as to a fact material to the lawfulness of the sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).)

COUNT THREE

(False Statement During Purchase of Firearm)

On or about August 19, 2021, in the City of Virginia Beach, Virginia, in the Eastern District of Virginia, the defendant, JONATHAN MORRELL SCOTT, in connection with the acquisition of a firearm, to wit, a Bersa Pistol, Model: THUNDER 380, Caliber: .380 ACP, from Superior

Pawn & Gun, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did unlawfully and knowingly make a false and fictitious written statement to Superior Pawn & Gun, which statement was intended and likely to deceive Superior Pawn & Gun as to a fact material to the lawfulness of the sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).)

COUNT FOUR

(False Statement During Purchase of Firearm)

On or about October 12, 2021, in the City of Virginia Beach, Virginia, in the Eastern District of Virginia, the defendant, JONATHAN MORRELL SCOTT, in connection with the acquisition of a firearm, to wit, a Glock Pistol, Model 17, Caliber: 9x19, from Superior Pawn & Gun, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did unlawfully and knowingly make a false and fictitious written statement to Superior Pawn & Gun, which statement was intended and likely to deceive Superior Pawn & Gun as to a fact material to the lawfulness of the sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm.

(In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).)

CRIMINAL FORFEITURE

THE GRAND JURY FINDS PROBABLE CAUSE THAT:

1. The defendant, JONATHAN MORRELL SCOTT, if convicted of any of the violations alleged in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition used in or involved the violation.
2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).)

United States v. Jonathan Morrell Scott
Criminal No. 2:23-cr- 51

A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By: Kristin G. Bird
Kristin G. Bird
Assistant United States Attorney
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, Virginia 23510
Office Number - 757-441 -6331
Facsimile Number - 757-441-6689
kristin.bird@usdoj.gov